Brian Quiros

From: Tisa, Kimberly
Sent: Thursday, May 4, 2017 11:09 AM
To: Mike Zarba
Cc: Tisa, Kimberly; Trombly, Gary; Doubleday, Edward
Subject: CEC - Structural Steel Decontamination and Recycling
Attachments: May_4_2017 Comment Letter.pdf

Mr. Zarba:

EPA has received PCB sampling data for paint samples collected from steel beams following decontamination of these beams using a low pressure water jet system. Documents provided to EPA on the structural steel beams include the following:

- ***Strategic Environmental Services: September 22, 2016 PCB Sampling Plan for CEC Structural Columns and Trusses.***
- Truss and Column PCB Sampling Results. Transmitted by M. Zarba to K. Tisa via email on October 4, 2016.
- October 5, 2016. EPA (K. Tisa) notification to Town (M. Zarba) that steel beams were to be disposed as a >/= 50 ppm PCB waste unless otherwise sampled to determine disposal requirements. Determination based on fact that PCBs above regulatory thresholds were identified during truss/column sampling.
- SDS identified sample locations for paint sampling. Description, map, and photo-log for samples transmitted by M. Zarba to K. Tisa via email on October 14, 2016
- ***Strategic Environmental Services, October 20, 2016 PCB Remediation Waste Pilot Study.***
- November 9, 2016. EPA (K. Tisa) comments to Town (M. Zarba) on PCB decontamination plan and that the results of the pilot study did not provide sufficient data/information to support proposed decontamination plan. Also requested that Town provide results of the SDS paint sampling results to EPA.
- November 21, 2016. Transmittal of SDS paint sampling results to EPA (K.Tisa) by SDS with Partners letter dated November 16, 2016.
- *March 2, 2017 Proposed PCB Sampling Approach for Characterization of Paint on Structural Steel.*
- *April 19, 2017 Characterization of Paint on Structural Steel and Request for Authorization to Recycle* (received by EPA on 4/24/17)
- *May 1, 2017, Attachment 3 to April 19, 2017 submittal* (received by EPA on May 2, 2017)

Based on EPA's review of all documents listed above and its discussions with CTDEEP, EPA has identified additional comments/questions that will need to be addressed by the Town. The information presented does not clearly support the Town's position on waste classification of the structural steel at the Site.

EPA's comments are provided in the attachment to this email.

Upon review, should you have any questions, please contact us. We would request that any future discussion concerning the steel also include CTDEEP.

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By Electronic Mail

May 4, 2017

Town of New Milford
c/o Mike Zarba, Public Works Director
10 Main Street
New Milford, Connecticut 06776

Re: Century Enterprise Center - Request for Authorization to Recycle Structural Steel

Dear Mr. Zarba:

This is written in response to the request by the Town of New Milford to dispose/recycle structural steel generated during building demolition activities at the Century Enterprise Center property, located at 12 Scovill Street in New Milford. Information dated March 2, 2017 and April 19, 2017 was submitted on your behalf by TRC.

EPA has reviewed the information provided as well as submittals previously provided related to the structural steel. EPA comments on the proposed work follows. Comments are segregated by submittal for ease of your review.

A. Strategic Environmental Services: September 22, 2016 PCB Sampling Plan for CEC Structural Columns and Trusses

This plan was provided to EPA electronically on September 23, 2016. On September 26, 2016 EPA spoke with Ross Hartman of SES regarding issues with the plan. Mr. Hartman indicated that the plan would be revised. EPA noted this discussion in a September 27, 2016 email to M. Zarba. However, EPA has no record indicating that a revised plan was submitted to EPA.

B. November 16, 2016 Partner Engineering and Science, Inc. letter concerning Paint Sample Results

In the information provided, it was indicated that prior to paint sampling, surface areas were cleaned with hexane to remove oils and PCB-containing dust. It is further stated that both Mr. Zarba and Mr. Doubleday were satisfied that the steel had been thoroughly cleaned with hexane. Following this surface cleaning, paint samples were collected and analyzed for PCBs from 13 different locations. Four out of 13 samples were identified to contain PCBs at

greater than (">") 50 ppm, unadjusted for iron. When adjusted for iron content, 5 out of 13 samples were found to contain > 50 ppm PCBs. Please confirm that the Town was satisfied as to the surface cleaning performed during this sampling event. For clarification, also please be aware that cleaning with hexane is an approved method under 40 CFR Part 761 for decontamination of PCBs from surfaces, albeit *non-porous surfaces*

C. *March 2, 2017 Proposed PCB Sampling Approach for Characterization of Paint on Structural Steel*

1. For clarification on this submittal, EPA's Approval did not require submittal and EPA approval of this plan nor did CTDEEP require submittal of such document. Rather, EPA's Approval required submittal of data to support an alternative disposal from the greater than or equal to ("≥") 50 ppm PCB waste requirement under the Approval.

2. Page 2. PCB Sampling Plan for Dust

    a. Attachment 2. Please see Section A above with EPA comments on September 22, 2016 PCB Sampling Plan.

    b. 3rd paragraph. Reference is made to Aroclor 1264 and that the primary Aroclors identified in the wipe samples were 1242, 1248, and 1264. It is not clear if 1264 should be Aroclor 1254 or 1260. Also, EPA's review of the data indicated that the primary Aroclors identified appeared to be 1248, 1254, 1260 and in some cases 1268. Clarification is requested on the Town's conclusion pertaining to the identified Aroclors.

3. Page 3. Final Decontamination Plan.

    a. It is indicated that to confirm the effectiveness of the plan (Attachment 5), that one of the stacks of steel located in the center section of the building was decontaminated. Given the information (photos with wipe sample locations) provided in Attachment 6, it would appear that many of the wipe sample locations were either highly rusted and/or contained no paint. Thus, please be aware that for purposes of EPA's evaluation, these wipe sample results could only be used to determine if surficial (e.g., PCB dust) was present and could not be used to conclude anything regarding the PCB concentrations in the paint. Please provide a copy of the wipe sampling procedure used by SDS.

    b. For the EMSL data, no QA/QC sample such as surrogate recoveries, was included. Thus, it is unclear how this data was validated.

    c. Attachment 5: *November 14, 2016, Rev. 3 Structural Steel and Decontamination and Wipe Sampling Plan.* Please clarify if at any point prior to the March 2, 2017 submittal, if this revision was ever provided to EPA, as EPA was unable to find any record of a previous submttal to EPA.

4. Page 4. Last paragraph. It is stated that because the manual decontamination method used by Partner had not been proven, decontamination of 4 steel beams using the low pressure water jet method was evaluated. (As noted above in Section B, manual decontamination of surfaces with hexane is authorized as a proven decontamination method under 40 CFR § 761.79 given that PCBs are at least 5% soluble in hexane.) The Town's assessment for the initial 4 sample areas included decontamination using the low pressure water jet system followed by paint sampling.

    a. Please clarify how the Town was able to identify the exact piece of steel beam associated with these 4 locations. EPA assumes that the Town decontaminated and collected the paint sample from an adjacent location rather than from the same sample location as Partner, but EPA requests confirmation on this.

5. Table 2. Please confirm that the beam size units are correctly expressed (inches) for both dimensions. EPA believes that at least one dimension should be expressed in feet rather than in inches.

6. Tables 2 and 3.

    a. As indicated in Section B, above, the Partner analytical results were adjusted by the iron content of the sample. Please clarify if the Town considered adjustment of the paint analytical results based on the iron content in its samples. If not, why?

    b. With respect to the analytical data reports provided in Attachment 8, EPA notes a huge difference between the iron content of the Partner samples versus those samples collected by TRC. There is no discussion of how this could have affected the reported PCB analytical results within the submittal. It is also interesting to note that only one (1) Aroclor was reported in the TRC samples versus multiple Aroclors in the Partner samples. However, it was indicated on the Phoenix Lab reports that the PCB pattern indicated there was a mixture of Aroclors and that the PCB was quantified as "a timed group and reported as Aroclor 1260". It is unclear if this could have caused a bias-low reporting concentration in the samples. This should be discussed in the submittal. EPA also requests that the Town provide EPA with copies of the PCB chromatograms and associated calibration standards for the samples analyzed by Phoenix and identified as samples #4, #5, #6, #8, #9A-PCB-Paint, #12A-PCB-Paint, and #13A-PCB-Paint.

7. Page 7. 1st paragraph. It is indicated that the PCB Aroclor primarily detected in the paint samples is Aroclor 1260. EPA does not believe this is an accurate statement. Please see EPA Comment 6.b., above.

8. Pages 7 through 10

    a. As described, approximately 17.5% of the overall steel that has been decontaminated using the low pressure water jetting system, was placed into "Stack 1". Stack 1 was then divided into 4 sections. Two of these sections were then inventoried to determine how much of each type of steel was present and then those numbers were extrapolated to approximate the total amount of each steel type remaining at the site in all 4 stacks. Table 3 then provides the composition of Stack 1 based on this procedure.

        i. Please provide the composition of the individual 2 sections that were inventoried and then explain how Table 3 was developed for Stack 1.

        ii. Please provide the estimated number of each type of steel component remaining at the Site (i.e., in the 4 Stacks).

        iii. Given that only 1 stack was "disassembled" and inventoried in this manner, please explain how the Town has determined that this 1 Stack can be used as the basis for the steel inventory in the remaining 3 stacks of steel.

        iv. Based on the inventory of Stack 1, please clarify if all of the components were found to be painted or if any type of components were generally bare (e.g., > 95% of surface showing little to no paint).

    b. Page 9. The first paragraph is confusing. Here it is indicated that the purpose of the inventory was to determine information on each "stack" and then confirm that these "stacks" are representative of the steel inventory on site. In this paragraph, should "stack" be "section"? Otherwise, please clarify this paragraph.

    c. Table 3. Based on EPA's analysis of Table 3, the number of samples collected vs. total for each type of steel component varied between 1.5% to approximately 20%. It is unclear how the Town determined that these samples are adequate to represent all the steel associated with Stack 1, and then be extrapolated to the remaining Stacks. Further, it is unclear if all component types were included in this sampling. Based on the component descriptions in Table 2, there appear to be components not shown in Table 3. For example, Building Envelop Columns (9.5 x 6) and Inner Building Columns (13.5 x 11). Please clarify and discuss.

9. Page 10 and 11. EPA requests that dimension units be reviewed and corrected, as necessary, for accuracy. It appears that some units expressed as inches should be expressed in "feet".

D. April 19, 2017 Characterization of Paint on Structural Steel and Request for Authorization to Recycle

1. In this submittal, the Town has provided the results of additional paint samples collected from a pile of steel previously decontaminated using the low pressure water jet system (also described in the March 2, 2017 submittal). In its conclusions, the Town has determined that the paint on the structural steel is an *Excluded PCB product* and thus is not regulated for disposal under 40 CFR Part 761. In this conclusion, the Town does not propose to separately manage that steel where the PCB concentration in the paint was found to be ≥50 ppm.

    a. See Section C, Comment 6 re: iron content of samples and effect on PCB concentrations. EPA notes that no such analysis was run on the additional samples collected in March 2017.

    b. Please be aware that to be an *Excluded PCB Product* all criteria specified under the *Excluded PCB Product* definition at 40 CFR § 761.3 must be met, not just the PCB concentration. There is no discussion of this in the request.

    c. Unless the Town can explain why that data (both Town and Partner samples) showing PCB concentrations ≥ 50 ppm is not valid data, these data must be considered for waste disposal.

    d. In this submittal, the Town is requesting use of the low pressure water jetting system followed by wipe sampling to support the decontamination of the steel.

        i. Please clarify if the Structural Steel Decontamination and Wipe Sampling Plan (Rev. 3, November 14, 2016) would be the procedure used for the remaining steel on the site.

        ii. What is the proposed disposition of the < 50 ppm PCB-containing painted steel beams? (i.e., where would these items be disposed of). The last contractor work plan that EPA reviewed was Rev. 7, November 7, 2016. It is not clear that this is the most current plan given the date of the steel decontamination plan.

        iii. Given the volume of steel at the site and the variability/representativeness of the paint samples collected, it is unclear why only the low pressure water jetting system and not a high pressure water jetting system was evaluated. The later likely would be able to remove paint and decrease uncertainty associated with sampling and waste management. High pressure decontamination has been used at other sites to successfully remove paint to allow recycling. Please explain why high pressure water jetting was not evaluated as a potential decontamination method.

Should you have any questions, please feel free to contact me at (617) 918.1527.

Respectfully,

Kimberly N. Tisa, PCB Coordinator
Office of Site Remediation & Restoration

Cc: G. Trombly, CTDEEP
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